



U.S. Department of Justice

Antitrust Division

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July 31, 2017

ECF & HAND DELIVERY

Honorable Richard Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: U.S. v. Richard Usher et al, 17-Crim-019 (RMB)

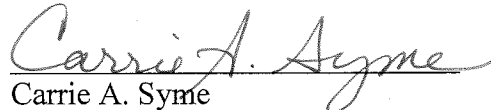
Dear Judge Berman,

On behalf of the United States, Defendant Richard Usher, and Defendant Christopher Ashton, we jointly seek a minor revision to the pretrial release conditions for these two defendants.

Paragraph 5 of the current pretrial release orders for Mr. Usher and Mr. Ashton, as entered by this Court on July 17, 2017, require the defendants to return their passports to the U.S. Embassy in London, England, each time they return to the United Kingdom after appearing before Your Honor in this matter. After inquiring with authorities in the United Kingdom, the government has found that the Embassy will not in fact retain those passports and instead will require a different procedure that may cause delays for the defendants when attempting to retrieve their passports for approved travel. Therefore, for the sake of allowing efficient travel by the defendants and ensuring timely attendance before the Court, both the government and counsel for Defendants Usher and Ashton seek the Court's approval to allow these defendants to return to and maintain their passports with their London counsel instead. (Note that the pretrial release order for co-defendant Rohan Ramchandani already allows him to return and maintain his passport with his counsel, and therefore does not need the same revision.)

By signing this letter below, London-based counsel for Mr. Usher and Mr. Ashton each represent to this Court that they will return the passport to their client only as necessary for him to conduct travel that is approved under that client's pretrial release order, and will keep the passport securely in their possession at all other times.

Sincerely yours,

  
Carrie A. Syme  
Trial Attorney

Jeffrey D. Martino  
Chief, New York Office

U.S. Department of Justice, Antitrust Div.  
26 Federal Plaza, Room 3630  
New York, NY 10278

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1221 Avenue of the Americas  
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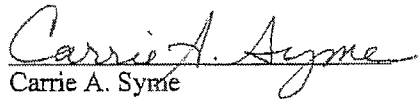
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Sara George  
Stephenson Harwood LLP  
Attorneys for Christopher Ashton

1 Finsbury Circus  
London, England EC2M 7SH

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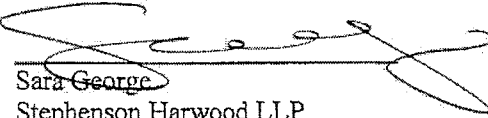
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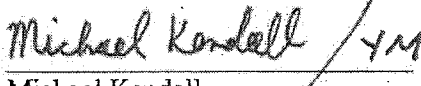
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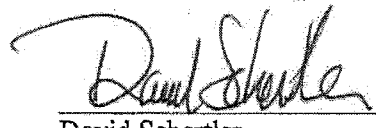
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